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4 Counsel for Defendant Ashiegbu

5 IN THE UNITED STATES DISTRICT COURT

6  
7 FOR THE NORTHERN DISTRICT OF CALIFORNIA

8 UNITED STATES OF AMERICA, ) No. CR 07-0677 CRB  
9 Plaintiff, )  
10 v. ) DEFENDANT ANDREW  
11 ANDREW IHENTUGE ASHIEGBU, ) ASHIEGBU'S REPLY TO  
12 Defendant. ) UNITED STATES'  
  ) OPPOSITION TO HIS  
  ) MOTION TO TAKE RULE 15  
  ) DEPOSITIONS

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13 Date: June 11, 2008  
Time: 2:15 p.m.  
Hon. Charles R. Breyer

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17 Defendant Andrew Asheigbu hereby replies to the United States' Opposition to his  
18 Motion to Take Rule 15 depositions as follows:

19 The United States has not indicated, through its counsel, that it knows of any  
20 reason Alice Anyanwu would not be able to avail herself of the B-2 nonimmigrant visa  
21 process to secure her presence at defendant's trial. Defendant submits that Alice  
22 Anyanwu will attempt to do so and, thus, asks that this motion be held in abeyance until  
23 such time as defendant can apprise the Court of Ms. Anyanwu's progress in that regard.  
24 Assuming that a trial date will be set within several months, there should be enough time  
25 for the nonimmigrant process to bear results either positive or negative.

26 Regarding the possibility of a conflict of interest as identified by the government's  
27 counsel in its Response to defendant Andrew Ashiegbu's Joinder in defendant Linda

Ashiegbu's Motion to Suppress Statements, the undersigned counsel, and defendant Andrew Ashiegbu, welcome the opportunity to express to the Court at a hearing the facts surrounding counsel's retention and acquisition of information, its timing, and any other topic the Court finds relevant to its inquiry.

Respectfully submitted,

JAMES PHILLIP VAUGHNS  
Attorney for ANDREW ASHIEGBU